

## AFFIDAVIT

### Introduction and Background

I, Justin D Koble, Postal Inspector with The United States Postal Inspection Service, being duly sworn, depose and say:

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS's Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of, among other statutes, Title 21, United States Code, § 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code, § 1956 and 1957 (money laundering).
2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (P&DC) involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.
3. The facts in this affidavit come from my personal observations, my training, experience, and information obtained from other law enforcement personnel and from persons with knowledge regarding relevant facts and witnesses. This affidavit is intended to show merely that there is sufficient probable cause to find violations of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii) (possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine) and Section 843 (prohibited use of a communication facility- U.S. mail) in support of the requested criminal complaint and arrest warrant.
4. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant and criminal complaint, your affiant did not include each and every fact known concerning this investigation. Your affiant has set forth only the facts that are believed to be necessary to

establish probable cause that Jermaine C, Jeffries (“JEFFRIES”) committed the violations listed above.

**Facts Supporting Findings of Probable Cause**

5. On or about December 5, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted the United States Priority Mail parcel bearing United States Postal Service (“USPS”) tracking number 9505 5138 2071 2337 3777 10 (hereinafter referred to as the “SUBJECT PARCEL”), upon arrival at the USPS Reynoldsburg Main Post Office, 7185 East Main Street, Reynoldsburg, Ohio 43068. The SUBJECT PARCEL is addressed to “J. Horton, 2870 Arrowsmith. DR, Reynoldsburg, OH 43068” with a return address of “Tint & Audio Experts, 11545 Artesia Blvd, Artesia, Ca 90701”. The SUBJECT PARCEL is a white, USPS Priority Mail size medium flat rate box measuring approximately 12” x 3 1/2” x 14 1/8” and weighing approximately 6 pounds, 15.6 ounces. The SUBJECT PARCEL was mailed from the USPS Bellflower Main Post Office, 9835 Flower Street, Bellflower, California 90706 on or about December 3, 2022, at approximately 1:18pm PST. The \$17.05 in United States postage affixed to the SUBJECT PARCEL was paid for using cash.
6. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL was the “source state” origination of the parcel, as well as the destination of the SUBJECT PARCEL. US Postal Inspectors, Special Agents of the Drug Enforcement Administration (“DEA”), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently the same shipping entity utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.
7. On or about December 5, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The destination address, “2870 Arrowsmith. DR,” was found to be a valid and deliverable address in the 43068 zip code. The name “J. Horton” was not found to be associated with this address. Further, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “11545 Artesia Blvd,” was found to be a valid and deliverable address in the 90701 zip code. A business named “Tint & Audio Xperts” was

found to be in operation at this address. It was noted the business spells Experts, "Xperts", as opposed to the spelling indicated on the SUBJECT PARCEL.

8. Regarding both the above-described return and destination addresses, I know through training and experience, that shippers of drugs and drug proceeds will often utilize a valid business name and/or address without the knowledge or consent of the business to legitimize the shipment and to reduce the possibility of identification and apprehension by law enforcement. Additionally, while a valid delivery address is necessary to ensure the delivery of a parcel, a fictitious delivery name is often utilized for the same reasons previously discussed.
9. On December 5, 2022, a federal search warrant authorizing the search and seizure of the SUBJECT PARCEL was signed in the Southern District of Ohio by the honorable Chelsey M. Vascura, United States Magistrate Judge. The search warrant was executed the same day.
10. The SUBJECT PARCEL was found to contain approximately 2,903 grams of a white crystalline substance which field tested positive for methamphetamine. Based on my training and experience, this quantity of methamphetamine is a distribution quantity.
11. The contents of the SUBJECT PARCEL were repackaged, using approximately 2 pounds of suspected methamphetamine, with the remainder being replaced by a substance resembling methamphetamine. A GPS tracking device and parcel beeper were placed into the SUBJECT PARCEL.
12. On December 6, 2022, at approximately 11:24am EST, the SUBJECT PARCEL was delivered to 2870 Arrowsmith Drive, Reynoldsburg, Ohio 43068 by an undercover US Postal Inspector serving in an undercover capacity as a USPS Letter Carrier. The SUBJECT PARCEL was left on the front porch of the residence, which is consistent with the delivery of normal USPS parcels.
13. Through the use of USPS, law enforcement, and open-source electronic databases, law enforcement knows 2870 Arrowsmith Drive, Reynoldsburg, Ohio 43068 to be the residence of JEFFRIES.
14. On December 6, 2022, at approximately 1:19pm EST, JEFFRIES was observed exiting the front door of the residence. JEFFRIES briefly looked at the SUBJECT PARCEL before walking to a vehicle which was parked in the driveway. A short time later, JEFFRIES walked back toward his residence, picked up the SUBJECT PARCEL and took it into the residence.
15. On December 6, 2022, at approximately 1:40pm EST, a search warrant for 2870 Arrowsmith Drive, Reynoldsburg, Ohio 43068, which had previously been granted in the Southern District of Ohio, was executed at the residence. The SUBJECT PARCEL was found, unopened, near the front door of the residence.

16. During the execution of the search warrant at the residence, law enforcement discovered bulk currency and a scale with suspected drug residue on it in a hidden compartment in the basement, as well as packaging materials consistent with the packaging and distribution of methamphetamine.

### Conclusion

17. Based on the facts set forth in the Affidavit, I maintain there is probable cause to believe that Jermaine Jeffries, did knowingly possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(A)(viii) and did knowingly or intentionally use a communication facility, namely the United States mail, to facilitate the commission of said offense, in violation of Title 21 United States Code, Section 843(b). Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant for the above individual.



Justin D. Koble  
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this \_\_\_\_ day of December 6, 2022, in Columbus, Ohio.



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CHELSEY M. VASCURA  
United States Magistrate Judge